

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KIMBERLY F. MILLS, et. al

Plaintiff,
VS.

UNITED AIRLINES, INC. et al.

Defendant.

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CIVIL ACTION NO. 4:21-CV-01241

AGREED MOTION FOR CONTINUANCE

Come Now, Plaintiff, Kimberly F. Mills, et al, and Defendants, United Airlines, Inc., ABM Aviation, Inc., Simplicity Ground Services, LLC d/b/a Simplicity USA, Antonio DeLeon, Jessica Mora, and Prystal Milton, and file this, their *Agreed Motion for Continuance*, which is agreed to by all parties, and would respectfully show this Honorable Court as follows:

1. Plaintiffs herein allege multiple incidents in multiple venues which ultimately caused the death of Mr. Mills. Defendants deny this and allege that Mr. Mills' death was caused by a tragic vehicular accident in which Mr. Mills was the sole occupant. Due to the number of parties involved and the liability, medical, and damage facts, there are numerous depositions that need to be taken.

2. Additional time is necessary to take the multiple depositions of fact witnesses that may have knowledge of the incident, and the need to set Plaintiffs' depositions, as well as obtain medical documentation about Plaintiff's pre-existing medical conditions. The Parties are therefore requesting a continuance of at least 98 days from the current June 27, 2022 trial date.

3. This continuance is not sought for the purpose of delay, but so that justice may be done.

4. For the foregoing reasons, Plaintiffs, Kimberly F. Mills, et al., and Defendants United Airlines, Inc., ABM Aviation, Inc., Simplicity Grounds Services, LLC, d/b/a Simplicity USA, Antonio DeLeon, Jessica Mora, and Prystal Milton, respectfully request that the Court grant this Agreed Motion, and reset this case for trial at least 98 days from the current June 27, 2022 trial date, as well as extend the remaining cutoff dates accordingly.

Respectfully submitted,

STEPP & SULLIVAN, P.C.

/s/ Jad J. Stepp

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